

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION**

Jennifer Andrews,

Plaintiff,

V.

Anderson Hydra Platforms, Inc. Anderson
Under Bridge, LLC, Cynthia Dandridge, and
Does 1-10,

Defendants.

Civil No.: _____

**DEFENDANTS ANDERSON HYDRA PLATFORMS, INC, ANDERSON UDER
BRIDGE, LLC AND CYNTHIA DANDRIDGE'S ANSWERS TO
LOCAL RULE 26.01**

Defendants Anderson Hydra Platforms, Inc. Anderson Under Bridge, LLC, and Cynthia Dandridge, provide the following responses to Local Civil Rule 26.01, Local Civil Rules of the United States District Court, District of South Carolina:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: None.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: The Plaintiff has requested a jury trial on any factual issues before the Court.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary,

partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the company; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: The corporate entitles identified are not publicly traded companies.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: Plaintiff filed her complaint in the York County, Court of Common Pleas, Sixteenth Judicial Circuit, which is included within the territory limits of the judicial district and division. It has been removed on the basis that the claims asserted in the Complaint arise under federal law as well as diversity of citizenship.

(E) Is this action related in whole or in part to any other matter filed in the District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are relayed such that they should be assigned to a single judge will be determined by the Clerk of Court on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: No.

s/Beverly A. Carroll

Beverly A. Carroll (Federal ID No. 62)

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ATTORNEYS FOR DEFENDANTS

May 21, 2020

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the within **Defendants' Answers to Local Rule 26.01** was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the registered participants, and further certifies that the within **Defendants' Answers to Local Rule 26.01** was served on counsel for the Plaintiff and was filed with the Clerk of the York County, South Carolina Clerk of Court in accordance with the provisions of the Federal Rules of Civil Procedure by causing to be deposited a copy of the same in an official depository under the exclusive custody and care of the United States Postal Service in a postage-paid envelope, addressed as follows:

Shaun C. Blake, Esq.
Jenkins M. Mann, Esq.
ROGERS LEWIS JACKSON MANN & QUINN, LLC
1901 Main Street, Suite 1200
Columbia, SC 29201

And via electronic mail as follows:

sblake@rogerslewis.com
jmann@rogerslewis.com

This 21st day of May, 2020.

s/Beverly A. Carroll
Beverly A. Carroll